

**OUTFITTERS AND
GUIDES ASSOCIATION**RECEIVED BY
AND WILDLIFE
GRIZZLY BEAR REC.
COORDINATORS OFFICE

November 1, 1997

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Dr. Chris Servheen
U.S. Fish and Wildlife Service Project Leader
Bitterroot Grizzly Bear EIS
P.O. Box 5127
Missoula, MT 59806

Re: Grizzly Bear Recovery in the Bitterroot Ecosystem Draft Environmental Impact Statement

Dear Dr. Servheen:

The membership of the Idaho Outfitters and Guides Association, a statewide non-profit business trade association representing nearly 70 percent of the 390-plus licensed and special use permitted businesses, oppose grizzly bear recovery in any Idaho ecosystem.

The proposed recovery area that includes three Idaho wilderness areas (the Selway Bitterroot, the Frank Church River of No Return and the Gospel Hump) along with surrounding national forest land in the Salmon-Challis, Payette, Nez Perce, Clearwater, Panhandle and Sawtooth national forests essentially overlie public lands and waters where the core of the Idaho outfitting and guiding industry provides services to the guided public. In the three aforementioned wilderness areas, over 150 outfitter water and land based small businesses provide float and power boat, hunting, fishing, pack trips, guest ranch and other activities for the segment of the American public that seek Idaho-based guided trips. We estimate another 100 businesses operate on public and private lands and waters in the surrounding forests, some unroaded, some not.

No where in the DEIS is there any specific analysis of the economic impacts on the Idaho outfitting and guiding economy, which is closely associated with the rural communities that surround the recovery area. The Salmon and Selway river systems alone support over 80 water based businesses providing boating and fishing recreation to the guided public. Land based guided activities such as hunting and pack trips within the recovery area include another estimated 170 small outfitting businesses.

The allocation of use by the federal government for guided floaters on the Main and Middle Fork Salmon and Selway rivers approximates 40 percent of the total. However, the actual numbers of guided floaters in nearly 60 percent of the total users. Over 20,000 persons, guided and non-guided float these two river systems annually.

1 IOGA wonders what new restrictions would be placed on boating outfitters who move from river campsite to campsite during their guided excursions that feature dutch oven cuisine. Salmon and Selway river outfitters are known nationally for their low impact camping methods. Nevertheless, there is only so much weight boats can carry. Will present aluminum and wood boxes used by boating outfitters be sufficient for storing and maintaining food on guided trips? Or does the USFWS plan to deposit government approved bear proof containers in the over 200 campsites associated with these river

1 | systems? I doubt it. Will river corridors be closed to river recreationists because of potential problem bears or because sow and cubs inhabit portions of the river corridors?

The guided and non-guided river recreation associated with the proposed Bitterroot Ecosystem recovery area stand out in contrast to recreation use in the other grizzly recovery areas mentioned in the DEIS (Glacier, Northern Rockies and Yellowstone). This fact is not discussed in the DEIS.

2 | No doubt there will be additional costs associated with operating a hunting or pack trip business within the recovery area due to the necessity to obtain bear proof containers and other associated changes in operations. Where in the DEIS is this economic impact measured?

3 | What will happen to traditional Idaho black bear hunting methods used by both the guided and unguided hunting publics in the recovery area? Potential trail closures, while noted in the DEIS as rare in other recovery ecosystems, would make it difficult to "get there" to conduct guided hunting or pack trips and would restrict use by guided boating guests.

4 | Some outfitters are very concerned about human safety, both for employees and the guided public. We are charged by state law to provide for the "health, safety and welfare" of those who use our services. Some are very concerned that families that make up a substantial number of the guests who take guided boating and pack trips will choose other vacations in non-grizzly bear recreation areas.

5 | I suspect that the answers to the aforementioned questions will be determined by the Citizen Management Committee mentioned in the preferred alternative. IOGA wonders why Idaho would receive only 7 of the 15 slots on the CMA when nearly 80 percent of the 28.4 million acres recovery area lie within Idaho? IOGA recommends that the ratio of make-up of the CMA be changed substantially between Idaho and Montana residents to reflect the affected recovery area. Furthermore, should the preferred alternative be implemented, IOGA recommends that the make-up of the CMA be tilted heavily toward current users of the wilderness areas. We recommend at least two outfitters for the CMA—one water and one land-based.

The Idaho outfitting and guiding industry is already heavily regulated by both state and federal governments. We are not interested in additional costs that will be associated with Bitterroot Ecosystem grizzly bear recovery due to more government regulation. Idaho industry studies indicate that the average net profit for a small outfitting business is 4.5 percent after all the bills are paid.

While it is laudable that some diverse interest groups have come together to support the preferred alternative, our industry is the one that stands to be affected the most in the core grizzly bear recovery wilderness areas.

Sincerely,



Grant Simonds
Executive Director